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32 **UNITED STATES DISTRICT COURT**
33 **NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

34 CHASOM BROWN, WILLIAM BYATT,
35 JEREMY DAVIS, CHRISTOPHER
36 CASTILLO, and MONIQUE TRUJILLO,
37 individually and on behalf of all similarly
38 situated,

39 Plaintiffs,

40 v.

41 GOOGLE LLC,

42 Defendant.

43 Case No. 5:20-cv-03664-LHK-SVK

44 **DECLARATION IN SUPPORT OF
45 STIPULATED REQUEST FOR ORDER
46 EXTENDING THIRD PARTY ERNST &
47 YOUNG LLP 'S DEADLINE TO
48 RESPOND TO SUBPOENA**

49 Judge: Honorable Susan Van Keulen

50 Case No. 5:20-cv-03664-LHK-SVK

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**DECLARATION IN SUPPORT OF STIPULATION TO EXTEND THIRD PARTY ERNST & YOUNG'S
52 DEADLINE TO RESPOND TO SUBPOENA**

1 I, Ryan J. McGee, declare as follows:

2 1. I am an attorney with the law firm of Morgan & Morgan, P.A., counsel for
3 Plaintiffs in this matter. I have personal knowledge of the matters set forth herein and am
4 competent to testify.

5 2. On November 18, 2021, counsel for Ernst & Young LLP (“EY”), Rachelle
6 Navarro, contacted Plaintiffs to request additional time to respond to the subpoena. The basis for
7 Ms. Navarro’s request was that, given the time needed to upload the data, for EY to review the
8 data that results from the searches, to allow Google to review the data in advance of the production
9 to screen for privileged information, the additional two to three days to make the production, and
10 the Thanksgiving holiday, EY needed more time to complete the production. Plaintiffs and EY
11 agreed to extend EY’s production date to December 7, 2021, provided that the Court approve the
12 request.

13 3. There have been no other extensions or modifications to the Court’s November 16,
14 2021 Order Granting In Part And Denying In Part Defendant’s Motion For Protective Order (Dkt.
15 335).

16 4. Plaintiffs have determined that granting this extension should not affect other
17 existing discovery deadlines.

18 I declare under penalty of perjury under the laws of the United States of America that the
19 foregoing is true and correct. Executed this 29th day of November, 2021 at Tampa, Florida.

20 _____ /s/ Ryan J. McGee

21 Ryan J. McGee

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